

ALEXIS G. PADILLA
Attorney at Law
378 Lewis Avenue #6
Brooklyn, NY 11233
Tel. 917 238 2993
alexpadilla722@gmail.com

January 25, 2024

BY ELECTRONIC FILING

Hon. District Judge Arun Subramanian
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

RE: **Naija Plowden v. City of New York, et al.**
23-CV-2699-AS

Your Honor:

My office represents Naija Plowden, the plaintiff in the above-referenced matter. I write on behalf of the parties to respectfully request that this matter be referred to the assigned Magistrate Judge for the purpose of scheduling a settlement conference. Discovery in this matter is currently scheduled to be completed by February 1, 2024. *See* ECF Entry No. 18. Thus far, the parties have exchanged all relevant discovery and completed the Court's mandatory mediation process. Although mediation was unsuccessful, the parties have continued to engage in settlement discussions. Based upon our continued discussions, the parties do believe that a settlement conference before Magistrate Judge Gary Stein may assist in bringing this matter to a resolution. The parties would request that discovery be stayed pending a settlement conference. Should the matter remain unresolved after a settlement conference, then the parties would request an extension of time to complete Discovery at that time.

On behalf of the parties, I thank the Court in advance for its time and attention to this matter.

Respectfully submitted By: /s/Alexis G. Padilla, Esq.
ALEXIS G. PADILLA, ESQ.
Attorney for Plaintiff
Naija Plowden
378 Lewis Avenue #6
Brooklyn, NY 11233
Tel. 917 238 2993
alexpadilla722@gmail.com

Cc: **BY ECF**

Joseph Russo, Esq.
New York City Law Dept.
Attorneys for Defendants

The Court will refer this case to Magistrate Judge Stein in an accompanying order. And though the Court appreciates the parties' attempts to settle this case, those efforts do not usually warrant a stay of discovery, especially when just one week of discovery remains. So the stay request is DENIED. If the parties can agree, they are free to extend discovery up to the date that motions for summary judgment are due, March 1, 2024. The parties may submit a letter motion requesting a discovery extension beyond that date and also requesting an extension to the motions deadline, but the Court is unlikely to grant such a request absent a compelling justification (ongoing settlement discussions are not such a justification).

SO ORDERED.

A handwritten signature in black ink, appearing to read 'A. Subramanian', written in a cursive style.

Arun Subramanian, U.S.D.J.
Date: January 25, 2024